

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	

COMMENTS OF EDUCATIONSUPERHIGHWAY, NFP

EducationSuperHighway submits these comments in response to the FCC's Public Notice released July 17, 2013 (designated DA 13-1590) seeking comment on the proposed revisions to FCC Forms 470 and 471.

EducationSuperHighway is a non-profit with the mission of upgrading the Internet infrastructure in every public K-12 school in America. Today, less than 20% of America's K-12 schools have the Internet infrastructure they need to support effective digital learning. This situation is a result of schools having both insufficient Internet connectivity and out of date LAN & Wi-Fi infrastructure.

EducationSuperHighway commends the FCC for its leadership in effecting positive change in the E-Rate program, beginning with changes to the submission forms. We strongly believe that the E-Rate application process, specifically with respect to Form 471, can become much more efficient and useful with some fairly simple changes. The suggested changes and rationale are outlined below and pertain to, in order: Block 1, Item 6; Block 4, Item 2; Block 4, Item 3; Block 5, Item 23; Block 5, Item 24; and the Block 5, Item 21 Attachment.

With the hope of increasing transparency, Block 1, Item 6g should include a section where applicants identify the services provided by any consultants. This could be in the form of a list of services that are checked if they are being provided. Such information will help the FCC identify what type of assistance school districts

appear to most need, which would then inform the FCC's decisions to make forms more user friendly.

In Block 4, Item 2 currently has one field in which applicant schools input their Entity Number as well as their NCES code. Unfortunately, many school districts do not actually input the Entity Numbers and NCES codes (all 12 digits) for each of the schools. We believe it would be incredibly helpful for E-Rate researchers and the public at large if both of these numbers were consistently input (for schools). Splitting this item into two items – one for Entity Number and another for NCES code – would make data analysis easier and would help make it clear to applicants that they should include this information in their application. In fact, this information should be mandatory. This information is important and, moving forward, we suggest rejecting applications that do not have this information until it is fixed.

Block 4, Item 3 currently asks for urban or rural status of each entity. We suggest replacing this with the classification system (two digit code) used by the U.S. Department of Education. Using this system would allow for improved data analysis across various federal and state databases.

Currently, the wording in Block 5, Item 23 is needlessly ambiguous and confusing, especially to those who are new to E-Rate forms. It's important to make the cost category wording as accurate as possible – so as to limit confusion and increase ease of use, but also so such categories could easily be used in Item 21 Attachments, since they should be the same categories. Currently, this is not the case. For example, Item 23A states “Monthly charges (total amount per month for service)” but says nothing about whether the cost is pre-discount or not. Only later, in Item 23C, is the word “pre-discount” mentioned. A reasonable person could induce the answer, but she could not be completely sure until USAC or an expert clarified it for her.

In an effort to make each of the cost categories as clear as possible – both for use on this Item, but also for Item 21 Attachments – we've outlined suggested cost

category wording in Exhibit 1. An alternative approach would be to move the word “Pre-discount” to the item header to the left of Items 23A-E so that it reads “Pre-discount Recurring Charges” and “Pre-discount Non-Recurring Charges” to the left of Items 23F-H.

Our third point pertains to Block 5, Item 24. This new section provides valuable information with regards to Internet bandwidth that will help the government and researchers better understand what applicants are purchasing. Ideally, the information in this section should be combined or done in place of the bandwidth numbers requested in Block 2, Item 7G. Regardless, the information collected in this section should be consistent with the Item 21 Attachment inputs, although the latter would get into more pricing detail. Moreover, just for clarification purposes, the Item header should read “other Internet Connectivity Services” as opposed to “other Connectivity Services.” Otherwise, the Item header is needlessly confusing, for there are many different types of connectivity that are not Internet related.

Also, an easy and important addition to Block 5, Item 24 would be to add a column where applicants can identify whether the Internet Connectivity is for “Internet Access” or “Wide Area Network.” This information is crucial to understanding what applicants are purchasing.

Fourth, while comments relating to Item 21 Attachments (whether self-made or created using the USAC site) were not specifically requested, we are including some comments on the Item 21 here because it is technically part of the Form 471.

- 1) There should exist a standardized Item 21 Attachment form that directs applicants to go into the level of detail needed to truly understand what they are purchasing. The addition of Block 5, Item 24a to Form 471 moves the discussion in the right direction, but, unfortunately, it is not enough. Fortunately, a robust, appropriately detailed Item 21 Attachment could provide detailed purchasing information without creating undue burdens on applicants.

- 2) Any Item 21 Attachment should have cost categories that match those found on the Form 471, such as Exhibits 1 or 2. Clear, consistent categories would limit mistakes, increase ease of use and improve the usefulness of the data.
- 3) Specifically, on Part 2 of USAC's electronic version of the Item 21 Attachment for Internet Access, we are pleased that bandwidth speed is requested but it allows applicants to input one line item with numerous different speeds. Hence, it currently allows inaccurate inputs as is, which distorts the data and makes it less useful.
- 4) Furthermore, also on Part 2 of USAC's electronic Item 21, the "Funding Requested on 471" line actually pulls in the wrong data. That is, the data that it pulls in is equal to the "Total Funding Year Pre-discount Amount" (Item 23I), not the amount of funding actually requested ("Funding Commitment Request," Item 23K). This should be remedied so as not to be unnecessarily confusing or misleading.

Lastly, the form as it currently appears has numerous editing mistakes that should be fixed before it is released. Namely:

- 1) Item 24 states, "Check this box if this request is for services or equipment that do not *providing* broadband..." (our italics). This, of course, should read, "Check this box if this request is for services or equipment that do not *provide* broadband..." (our italics).
- 2) There are numerous places where check-boxes are not where they need to be placed and/or cover wording. See Block 5, Item 24 for multiple examples.
- 3) There are also spacing issues on the form. For example, see the difference between Block 1, Item 6c and Block 1, Item 6d. Also see Block 1, Item 5a.

Exhibit 1 – Includes “Pre-discount” wording in each Item

Item Number	Current Wording	Issue	Suggested Wording
23A	Monthly charges (total amount per month for service)	Does not identify whether it is pre-discount or not	Total Monthly Pre-Discount Charges
23B	How much of the amount in A is ineligible?	Stated as a question – as such, not easily reproducible on an Item 21 Attachment	Total Ineligible Monthly Service Charges
23C	Eligible monthly pre-discount amount (A minus B)	Does not clarify total	Total Eligible Monthly Pre-Discount Charges (A minus B)
23D	Number of months service provided in funding year	No issue	
23E	Annual pre-discount amount for eligible recurring charges (C x D)	No major issue	Total Eligible Annual Pre-Discount Charges (C x D)
23F	Annual non-recurring charges	Does not clarify total or pre-discount status	Total Annual Non-Recurring Pre-Discount Charges
23G	How much of the amount in F is ineligible?	Stated as a question – as such, not easily reproducible on an Item 21 Attachment	Total Ineligible Annual Non-Recurring Pre-Discount Charges
23H	Annual eligible pre-discount amount for non-recurring charges (F minus G)	No major issue	Total Eligible Annual Non-Recurring Pre-Discount Charges (F minus G)
23I	Total funding year pre-discount amount (E + H)	No issue	
23J	Discount from Block 4 Worksheet	No issue	
23K	Funding Commitment Request (I x J)	No issue	

Exhibit 2 – “Pre-discount” wording moved to Item headers

Item Number	Current Wording	Issue	Suggested Wording
23A	Monthly charges (total amount per month for service)	No major issue	Total Monthly Charges
23B	How much of the amount in A is ineligible?	Stated as a question – as such, not easily reproducible on an Item 21 Attachment	Total Ineligible Monthly Service Charges
23C	Eligible monthly pre-discount amount (A minus B)	Does not clarify total	Total Eligible Monthly Charges (A minus B)
23D	Number of months service provided in funding year	No issue	
23E	Annual pre-discount amount for eligible recurring charges (C x D)	No major issue	Total Eligible Annual Charges (C x D)
23F	Annual non-recurring charges	Does not clarify total	Total Annual Non-Recurring Charges
23G	How much of the amount in F is ineligible?	Stated as a question – as such, not easily reproducible on an Item 21 Attachment	Total Ineligible Annual Non-Recurring Charges
23H	Annual eligible pre-discount amount for non-recurring charges (F minus G)	No major issue	Total Eligible Annual Non-Recurring Charges (F minus G)
23I	Total funding year pre-discount amount (E + H)	No issue	
23J	Discount from Block 4 Worksheet	No issue	
23K	Funding Commitment Request (I x J)	No issue	